



WISCONSIN

DEPARTMENT OF WORKFORCE DEVELOPMENT

Division of Economic Support

Bureau of Welfare Initiatives

**TO: Economic Support Supervisors
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Training Staff
FSET Administrative & Provider Agencies
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W-2 Agencies**

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Non W-2 ☐ **W-2** ☒ **CC** ☒

PRIORITY: Medium

**SUBJECT: TECHNICAL COLLEGE PARTICIPATION FOR CSJ & W-2 T
PARTICIPANTS**

CROSS REFERENCE: W-2 Manual, Chapters 7 and 8
Operations Memo 99-81
Child Day Care Manual, Chapter 2, 2.2.0

EFFECTIVE DATE: Immediately

PURPOSE

This memo explains the circumstances under which a Community Service Job (CSJ) or W-2 Transitions (W-2 T) participant may participate in a full-time technical college education program.

BACKGROUND

The Temporary Assistance for Needy Families (TANF) law specifies the work, training and education activities in which persons may participate in order to be engaged in work for the purpose of counting toward the work participation rate requirements. States are given flexibility in defining the individual work activities. These activities include:

- Vocational educational training;
- Job skills training directly related to employment;
- Education directly related to employment for those without a high school diploma or equivalent;

- Satisfactory attendance at a secondary school or GED course for those without a high school diploma or equivalent.

W-2 emphasizes that training is a route to gain meaningful employment, rather than an alternative to employment. It is important to provide flexible entry-level education and training to W-2 participants. Integrated into W-2 employment positions is one of the most important types of training - skills needed to obtain and hold a job - actual work experience. Involvement in educational activities alone is not an acceptable approach under W-2. Combining work with education and training will most likely yield long-term self-sufficiency for W-2 participants.

1999 Wisconsin Act 9, the 1999-2001 Biennial Budget, includes language in s.49.147(5m), Wis Stats., that allows a Community Service Job (CSJ) or Transition (W-2 T) participant to participate in a full-time technical college education program under specific circumstances. A participant engaging in this educational activity must participate in assigned work activities for 25 hours per week.

ELIGIBILITY

A W-2 applicant or ongoing W-2 participant must continue to meet the characteristics that warrant placement in a CSJ or W-2 T. An individual must first be determined nonfinancially and financially eligible for W-2 services. Based on an informal assessment of the applicant's recent job search efforts, work history, education, skills, interests and abilities, the FEP determines whether the applicant is ready for unsubsidized employment. Eligible applicants who are not ready for full-time unsubsidized employment may be placed in one of the 3 employment positions (Trial Job, CSJ or W-2 T).

PLACEMENT

Applicants and participants must always be placed at the highest level of participation possible. If an applicant meets the eligibility criteria, but has a strong work history and skills, the applicant may be most appropriate for placement on the Unsubsidized Employment rung of the W-2 ladder and offered intensive case management services.

The CSJ placement is primarily for individuals who are determined not ready for immediate full-time unsubsidized employment. If the initial assessment reveals that the applicant has barriers that prevent them from obtaining a full-time unsubsidized job, placement in a CSJ may be appropriate. The agency must continue to assist the participant in ongoing job search for unsubsidized employment throughout the placement in a CSJ.

The W-2 T employment position is for individuals who have severe barriers preventing them from obtaining full-time unsubsidized employment and are unable to successfully participate in one of the other W-2 employment positions for reasons such as the individual's incapacitation, the need to remain in the home to care for another family member who is incapacitated or disabled, or other serious family crises including legal problems, homelessness, domestic abuse, or children's school or medical activities.

TECHNICAL COLLEGE ACTIVITIES UNDER §49.147(5m)

To be approved, technical college education programs must be likely to lead to employment. An agency must consult with its Community Steering Committee and local technical college board to determine if a technical college education program will likely lead to employment. Agencies are encouraged to detail their own internal policies governing how appropriate programs will be identified and how Financial and Employment Planners (FEPs) will make a determination for placement in a technical college education program.

Education and training under W-2 should, at a minimum, prepare participants for entry level employment and the FEP determines what kind of education and training is appropriate based on a participants background and current situation. The FEP then helps identify education and training activities that will assist the participant in obtaining full-time employment. If the FEP determines that the individual is unable to obtain unsubsidized employment without additional training, the participant may be allowed to participate in a technical college education program for a maximum of 2 years as long as the agency has determined that the program will likely lead to employment. The decision should be documented in the case file.

A person placed in a CSJ or W-2 T may participate in a technical college education program as part of that placement if the participant meets all 3 of these requirements:

1. The participant maintains full-time status in the technical college education program, as determined by the technical college the participant attends, and regularly attends all classes;
2. The participant maintains a grade point average of at least 2.0 (or the equivalent, as determined by the technical college);
3. The participant is employed or engages in work activities under a CSJ or W-2 T for 25 hours per week in addition to class time.

CSJ Participants

CSJ participants are expected to participate 40 hours per week, which usually includes up to 30 hours per week in work training activities and up to 10 hours per week in education and training activities. CSJ participants eligible for technical college participation are also expected to participate up to 40 hours per week in a combination of 25 hours in work training activities and up to 15 hours of class time in the technical college program. Study time does not count as participation.

W-2 T Participants

W-2 T participants should be placed in full-time activity whenever possible, which includes up to 28 hours per week in W-2 T activities and 12 hours per week in education and training activities. W-2 T participants eligible for technical college participation are also expected to participate in full-time activity up to 40 hours per week in a combination of 25 hours in work training activities and up to 15 hours of class time in the technical college program. Study time does not count as participation.

EMPLOYABILITY PLAN

All hours of participation in the technical college program must be included on the participant's Employability Plan (EP). Any class time that is required of the participant in completion of a technical college program should be included in the activity plan portion (Part 3) of the EP. If a participant misses class time, those missed hours can be sanctioned according to current policy.

Including the technical college program on the EP does not obligate the W-2 agency to pay for the program out of its W-2 funding. If the participant has not identified available funding for the program, the agency may require the participant to do so.

JOB SEARCH

As a requirement of W-2, all participants must participate in appropriate job search. According to §49.147(2)(a)(1), Wis. Stat., a participant in a W-2 employment position shall search for unsubsidized employment throughout his or her participation. This is no different for a participant attending a technical college education program. If a participant obtains adequate unsubsidized employment as a result of this job search and the agency determines it is reasonable, the participant may be removed from their current placement and offered case management follow-up services whether or not the individual completed the training program. The individual would then have the option of continuing the education program on his or her own.

CHILD CARE

Parents who are participating in a CSJ or W-2 T placement that includes technical college participation as described in this memo are eligible for child care subsidies for those activities approved in their Employability Plan.

In addition, parents working in unsubsidized employment and attending a course of study that will help them to enhance or maintain employment are eligible for child care subsidies for both work and school for up to 2 years.

The course of study may or may not apply to the parent's current employment position. A parent can receive child care subsidies for both work and school when the course of study can help the parent maintain or enhance employment in the same field or obtain, maintain or enhance employment in another field.

For additional information about child care subsidies and education, see Operations Memo 99-81 or Chapter 2, 2.2.0, of the Child Day Care Manual.

CARES COMPONENT CODE – (TC)

A new code is added on screen WPCS. Use TC, the new code, for W-2 participants who meet the criteria required in the language in §49.147 (5m) and this Operations Memo.

SUMMARY

The Governor's 1999-2001 Biennial Budget allows a participant to participate in a technical college education program as part of a CSJ or W-2 T placement under very specific circumstances. A participant engaging in this educational activity must participate in assigned work activities for 25 hours per week.

QUESTIONS AND ANSWERS

- 1) *Does being in a technical college program assure a participant 2 years placement in a CSJ or W-2 T position?*

If a W-2 agency determines that an individual is ready for unsubsidized employment either at placement or at some point during participation in W-2, they are not required to place the participant or keep the participant in a CSJ or W-2 T in order to allow the participant to complete a training program.

- 2) *Are W-2 agencies required to pay for a participant's technical college program out of their regular contract funding?*

Including the technical college program on the Employability Plan (EP) does not obligate the W-2 agency to pay for the program out of its W-2 funding. If the participant has not identified available funding for the program, the agency may require the participant to do so. W-2 participants are eligible for financial aid resources available to all Wisconsin residents. Financial aid resources which may be available include low-interest student loans, the federal Pell Grant program, the Wisconsin Higher Education Grant (WHEG), the Talent Incentive Program (TIP), the Wisconsin Tuition Grant (WTG), the Minority Retention Grant, the Wisconsin Native American Grant and the Wisconsin Academic Excellence Scholarship (AES).